

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BLACKBIRD TECH LLC d/b/a  
BLACKBIRD TECHNOLOGIES,

Plaintiff,

v.

CLOUDFLARE, INC.,

Defendant.

C.A. No. 17-283-MSG

---

BLACKBIRD TECH LLC d/b/a  
BLACKBIRD TECHNOLOGIES,

Plaintiff,

v.

FASTLY, INC.,

Defendant.

C.A. No. 17-284-MSG

**JOINT MOTION TO ADJOURN DATES FOR  
BRIEFING DEFENDANTS' MOTIONS TO TRANSFER**

Plaintiff Blackbird Tech LLC d/b/a Blackbird Technologies and Defendants in the above-captioned matters, by and through their undersigned counsel, hereby move the Court to adjourn the due dates for Plaintiff's Answering Briefs to Defendant Cloudflare, Inc.'s Motion to Transfer Venue (-00283-MSG, D.I. 20) and to Defendant Fastly, Inc.'s Joinder of and Motion in Support of Cloudflare, Inc.'s Motion to Transfer Venue (-00284-MSG, D.I. 16). Plaintiff's Answering Brief to the Cloudflare motion is currently due July 5, 2017, and its Answering Brief to the Fastly motion is currently due July 11, 2017, per D. Del. LR 7.1.2(b). Given the intervening holiday weekend for Independence Day as well as the summer travel schedule of counsel, and in

order to have both of Plaintiff's Answering Briefs due the same day, the parties seek an adjournment of Plaintiff's Answering Briefs for both motions until August 3, 2017, which would make Defendants' Reply Briefs due August 10, 2017. The initial Scheduling Conference in these matters is scheduled for August 30, 2017. (*See* -00283-MSG, D.I. 16; -00284-MSG, D.I. 14). Accordingly, the parties believe briefing on Defendants' motions will have concluded by the initial Scheduling Conference, and that this extension will not impact the case schedule to be adopted at the conference. The parties are available at the convenience of the Court should the Court wish to discuss the request made herein.

Dated: June 27, 2017

STAMOULIS & WEINBLATT LLC

/s/Stamatios Stamoulis

Stamatios Stamoulis (#4606)  
Two Fox Point Centre  
6 Denny Road, Suite 307  
Wilmington, DE 19809  
(302) 999-1540  
stamoulis@swdelaw.com

*Counsel for Plaintiff  
Blackbird Tech LLC  
d/b/a/ Blackbird Technologies*

SHAW KELLER LLP

/s/ Jeffrey T. Castellano

Jeffrey T. Castellano (No. 4837)  
I.M. Pei Building  
1105 North Market Street, 12<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 298-0703  
jcastellano@shawkeller.com

*Counsel for Defendant  
Cloudflare, Inc.*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)  
1201 North Market Street, 16<sup>th</sup> Floor  
P.O. Box 1347  
Wilmington, DE 19899  
jbbefiling@mnat.com

*Counsel for Defendant  
Fastly, Inc.*

IT IS SO ORDERED this \_\_\_\_ day of June, 2017.

\_\_\_\_\_  
Hon. Mitchell S. Goldberg

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2017, I electronically served the forgoing document on all counsel of record in this action.

/s/ Stamatios Stamoulis

Stamatios Stamoulis #4606